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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

)
) Case No. 12-12020 (MG)
)

RESIDENTIAL CAPITAL, LLC, et al.,

)
) Chapter 11
)

Debtors.

)
) Jointly Administered
)

**JOINDER OF THE RESCAP LIQUIDATING TRUST TO THE REPLY OF THE
RESCAP BORROWER CLAIMS TRUST IN SUPPORT OF MOTION TO EXTEND
THE DATE BY WHICH OBJECTIONS TO CLAIMS MUST BE FILED**

TO THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE:

The ResCap Liquidating Trust (the “**Liquidating Trust**”), as successor in interest to the debtors (collectively, the “**Debtors**) in the above-captioned cases (the “**Chapter 11 Cases**”) submits this joinder (the “**Joinder**”) to the *Reply of the ResCap Borrower Claims Trust in Support of Motion to Extend the Date by Which Objections to Claims Must be Filed* [Docket No. 7406] (the “**Reply**”).¹ The Liquidating Trust respectfully represents as follows:

JOINDER

1. The Liquidating Trust files this Joinder to the Reply and requests that the Objections to the Motion be overruled. Because all Objections to the Motion were filed by Borrowers, the Liquidating Trust believes it is appropriate for the Borrower Trust to address the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Reply.

Objections and to prepare and file the Reply. The Liquidating Trust submits this Joinder to reflect its agreement with the arguments contained in the Reply.

2. As described in the Motion and the Reply, the Liquidating Trust and the Borrower Trust have made substantial progress in resolving the claims filed against the Debtors' estates. Additional time, however, is necessary to continue the claims reconciliation process. The relief sought in the Motion is commensurate with the magnitude of the claims asserted against the Debtors' estates and the size of the Chapter 11 Cases.

3. During the proposed extension of the Claims Objection Deadline, the Liquidating Trust will continue its efforts to resolve claims in a timely and expeditious manner, through attempts to consensually resolve the Unresolved Claims when appropriate, or, if necessary, seek to disallow certain Unresolved Claims.

CONCLUSION

WHEREFORE, the Liquidating Trust respectfully requests that the Court overrule the Objections, enter the Proposed Order, and grant such other and further relief as the Court deems just and proper.

Dated: August 22, 2014
New York, New York

KRAMER LEVIN NAFTALIS & FRANKEL LLP

/s/ Douglas H. Mannal

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